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FEDERAL COMMUNICATIONS COMMISSION
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ALLTEL SERVICE CORPORATION

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ORIGINAL
FILE

November 9, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

RE: GEN Docket No. 90-314, ET Docket No. 92-100, In the Matter of
Amendment of the Commission's Rules to Establish New Personal
Communications Services

Dear Ms. Searcy,

Enclosed for filing on behalf of the local exchange telephone subsidiaries and the cellular radio subsidiaries of ALLTEL Corporation are an original and nine copies of their comments in the above referenced proceeding.

Should there be any questions concerning this matter, please contact the undersigned counsel.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Diane Smith". The signature is written in dark ink and is positioned above the typed name.

Diane Smith
Vice President -
Federal Regulatory Counsel

rf
Enclosures

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OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

)	GEN Docket No. 90-314
)	ET Docket No. 92-100
In the Matter of)	
)	RM-7140, RM-7175, RM-7617,
)	RM-7618, RM-7760, RM-7782,
Amendment of the Commission's)	RM-7860, RM-7977, RM-7978,
Rules to Establish New Personal)	RM-7979, RM-7980
Communications Services)	
)	PP-35 through PP-40, PP-79
)	through PP-85

Comments of the ALLTEL Companies

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Their Attorneys

November 9, 1992

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SUMMARY

The ALLTEL Companies commend the Commission's efforts to make wireless communications services widely available and support the goals of universality, speed of deployment, diversity of services, and competitive delivery set forth by the Commission. For these goals to be recognized, LECs and cellular carriers must be allowed to provide PCS. These companies have the requisite expertise and commitment to develop the full potential of PCS as a family of mobile services, available to subscribers throughout all parts of the United States. Accordingly, the Commission should adopt the following recommendations:

-- Any definition of PCS should be broad enough to recognize the competitive potential of both present and future applications of PCS;

-- Both local exchange and cellular carriers should be eligible for PCS licenses within and outside of their service areas;

-- The MSA and RSA service areas presently used by cellular and interactive video and data services should be adopted for PCS licensing;

-- The Commission should permit licensing of five 2 GHz licensees of 20 MHz each, with 5 MHz held in reserve for each license;

-- PCS should be classified as a common carrier service and the rules governing PCS should apply equally to all wireless service providers, including cellular and LECs offering spectrum-based services.

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)	through PP-85

Comments of the ALLTEL Companies

The local exchange telephone subsidiaries and the cellular radio subsidiaries of ALLTEL Corporation (hereinafter the "ALLTEL Companies") respectfully submit their comments in response to the Notice of Proposed Rulemaking and Tentative Decision (the "Notice") in the above-captioned proceeding.¹

The 32 local exchange telephone subsidiaries of ALLTEL Corporation serve more than 1.2 million access lines in 25 states. The cellular radio subsidiaries of ALLTEL Corporation provide mobile communications in 17 of those states. The ALLTEL Companies will be directly affected by the rules established for the delivery

¹ Notice of Proposed Rule Making and Tentative Decision, GEN Docket No. 90-314 and ET Docket No. 92-100 (FCC 92-333), released August 14, 1992.

of Personal Communications Services ("PCS") and, thus, are vitally interested in the outcome of this proceeding.

I. INTRODUCTION

This proceeding seeks to establish the regulatory structure, spectrum allocation and licensing requirements for PCS. The Notice recognizes that PCS will have a great impact on the future development and configuration of all telecommunications networks, creating new markets and providing competition for existing services.² These rules, therefore, will have far-reaching consequences for the ALLTEL Companies and their customers. The ALLTEL local exchange telephone companies will be directly affected by increasing competition from wireless providers, and this proceeding will determine the range of competitive responses available to local exchange carriers ("LECs") such as ours. The ALLTEL cellular radio subsidiaries will be similarly affected since the ability of an incumbent cellular carrier to deliver new and advanced services under competitive terms and conditions will be directly affected by this proceeding.

The ALLTEL Companies commend the Commission's efforts to make wireless communications services widely available and support the

² Notice at para 4.

goals set forth to guide this proceeding.³ Both the ALLTEL cellular radio subsidiaries and the ALLTEL local exchange telephone companies share the goal of ensuring that consumers have access not only to basic communications services but new and advanced services as well. For this reason, the ALLTEL Companies urge the Commission to recognize the important interests of existing cellular and telephone communications service providers in the provision of PCS services.

The comments that follow address a number of issues regarding eligibility, service areas, number of licensees, and regulatory status. Each of these items is critical to the development of a widely available, diversified and competitive PCS marketplace.

II. SERVICE DEFINITION

The Notice defines PCS as a "family of mobile or portable radio communications services which could provide services to individuals and business, and be integrated with a variety of competing networks", and further proposes that spectrum allocated for PCS not be used for broadcasting service and that fixed services generally be allowed only as ancillary to the mobile PCS services.⁴

³ These goals are universality, speed of deployment, diversity of services, and competitive delivery. Notice at para. 6.

⁴ Id. at paras. 29-30.

Defining PCS is no easy task. It is easy to get lost in the technicalities and promise. It seems clear, however, that PCS is, indeed, a family of mobile services - some of which currently exist and others which are rapidly emerging.

Among the services that could be classified as existing PCS are landline, payphone, dispatch, paging, SMR, cellular, cordless, wireless LANs, mobile data, and air-to-ground. Emerging PCS services include telepoint, advanced telepoint, personal telecommunications service, advanced cordless/wireless business, and mobile satellite.⁵ This wide array of services, both existing and emerging, requires that the Commission view PCS broadly, recognizing two major characteristics. The first is that PCS utilizes a distinct, personal calling number that travels with an individual. The second characteristic is that many PCS applications already or will soon compete with LEC and cellular services. For this reason, the ALLTEL Companies urge the Commission to maintain its broad definition of PCS as a "family of mobile services", recognizing the competitive potential of both present and future applications of PCS. Additionally, the Commission should not limit the use of PCS spectrum by requiring that fixed services generally be allowed only as ancillary to

⁵ This corresponds with Telocator's description of PCS Services. See Telocator PCS Section Marketing and Consumer Affairs Committee, Service Description Subcommittee, PCS Service Descriptions, July 22, 1992. Telocator is a national trade association representing the personal communications industry.

mobile PCS services. Until far more is known about the breadth of PCS' potential, this requirement could unfairly limit the services available to the public.

III. ELIGIBILITY

Of paramount concern in this proceeding is the issue of eligibility. As discussed above, PCS providers will compete with both LECs and cellular carriers, just as LECs and cellular carriers are beginning to compete with each other. For this reason, the Commission should not artificially inhibit the development of PCS by restricting LECs or cellular carriers from entering it. To do so would be contrary to the Commission's goal of encouraging a universally available, diversified and competitive telecommunications marketplace.

A. Cellular Carriers Should be Eligible for PCS Licenses Within or Outside of their Service Areas.

The ALLTEL companies support the Commission's proposal to permit cellular providers to obtain PCS spectrum for use outside of their cellular service areas.⁶ The grant of PCS licenses to cellular carriers out-of-region will ensure continued expansion of the robustly competitive wireless marketplace already in place.

⁶ Notice at para. 67.

The Commission should also allow PCS licensing for cellular carriers within their cellular markets. This action should be taken for several reasons.

First, allowing cellular carriers access to PCS licenses for use within their service areas will encourage, not impede, competition since numerous other spectrum licensees, such as paging and dispatch companies, SMRs, mobile data providers, and long-haul microwave users are all potential PCS providers. Therefore, to single out cellular carriers for exclusion makes little sense. All of these likely participants have expertise and experience in the wireless marketplace. Other potential licensees, such as cable companies, have expertise and experience in infrastructure development and service delivery. In view of the scope and capabilities of the field of potential PCS providers, excluding a particular class of carrier is unnecessary and will only harm the evolution of strong PCS competition.

Second, cellular carriers are among the premier providers of wireless technology today - not just domestically but internationally as well. Limiting their access to the spectrum necessary to deploy new PCS services will delay innovation and, ultimately, service delivery. Prohibiting experienced wireless service providers from participating in a technology that will support wireless payphones, mobile data and advanced telepoint

services denies the marketplace the benefit of the expertise these companies can provide.

Third, it is clear that PCS will compete with existing cellular service providers. As a result, it would be counterproductive to deny cellular carriers a full range of market-driven responses. As discussed above, PCS encompasses a broad array of services. No carrier should be prohibited from providing the full range of services desired by its customers, for this is when the consumer has the most choice, and, therefore, receives the greatest benefit.

Finally, the ALLTEL Companies support the Commission's proposal to revise Section 22.930 of their rules to state explicitly that cellular licensees may provide PCS-type services such as wireless PBX, data transmission, and telepoint services and the proposal to remove the notification requirement to allow cellular carriers greater flexibility.⁷ Such authority will encourage spectrum efficiency and reduce regulatory burdens. Nevertheless, these rule changes are not sufficient to permit cellular licensees to be full participants in the PCS market, and unrestricted eligibility for PCS spectrum is necessary to ensure the robustly competitive marketplace that the Commission desires. Even if cellular licensees are permitted to use existing spectrum for PCS-type services, this spectrum is already used for

⁷ Id. at para. 70.

traditional cellular mobile, vehicular service. R. Craig Roos, President, Personal Communications Network Services of New York, Inc., a LOCATE Company, has observed:

"Specifically, cellular, unlike PCS, can not effectively serve the growing market for 'portable' (rather than mobile) wireless communications. Since its inception, cellular service and technologies have been tailored to provide mobile communications to users in automobile(s) travelling at high speeds." ⁸

Cellular carriers must have access to any spectrum licensed for PCS in order to provide the new services promised by this emerging technology. If the Commission's predictions are correct regarding the burgeoning demand for wireless services, then the public interest will be ill-served by denying one vital segment of the industry the ability to compete to meet that demand for new services.

B. Local Exchange Carriers Should be Eligible for PCS Licenses Within Their Service Areas.

The ALLTEL Companies strongly believe that LECs should be eligible for PCS licenses inside their territories.⁹ As a matter of policy, telephone companies should be permitted to provide communications services through whatever technologies are the most

⁸ Written Remarks of R. Craig Roos, Personal Communications Network Services of New York, Inc., a LOCATE Company, before the Federal Communications Commission En Banc Hearing on Personal Communications Services, December 5, 1991, at pp. 12-13.

⁹ Eligibility outside of LEC service areas is assumed in accordance with the Notice at footnote 52 which states: "They (LECs) would not be barred from holding 2 Ghz PCS licenses outside their service areas."

efficient and cost effective. The ALLTEL local exchange telephone companies provide service in many sparsely populated, rural areas. Many of these communities rely on those companies to deliver up to date, modern communications services. In this regard, it is important to recognize the unique obligations, particularly universal service requirements, imposed on LECs. Universal service, as defined today, is considerably different from universal service as envisioned as recently as ten years ago. Now, consumers demand from their telephone company new and advanced services that enable them, regardless of location or geography, to operate in the "information age". So long as LECs have an obligation to serve, then they must have the flexibility to deliver through any available technologies the services that subscribers demand.

Additionally, the ALLTEL Companies agree with the Commission that PCS is likely to be both a complement and potentially a competitor to local wireline exchange service.¹⁰ It is important to note, however, that LECs already face competition from several directions, not just wireless service providers. Cable companies, ALTs and other expected PCS participants are rapidly growing competitors. The testimony of Jim Chiddix, Senior Vice President, Engineering and Technology of the American Television and Communications Corporation, at the FCC's En Banc Hearing on PCS is illustrative:

¹⁰ Id. at para. 71.

"(T)he cable industry is in the best position to realize the vision of a broadband, interactive communications infrastructure capable of supporting virtually any communications service consumers demand. And unlike the telephone industry, which has engaged in much rhetoric about the benefits of fiber technology, the cable industry will provide this broadband infrastructure in the near term and in an economically efficient fashion."¹¹

It is evident from this statement that LECs are faced with competition not only for the services they offer but also from competing infrastructure providers. One of the results of this competition will be to increase pressure on local rates paid by residential and rural ratepayers. If PCS licensees are permitted to offer exchange-type services to select customers at the same time that LECs are prohibited from using cost effective technology to compete, then LEC customers may not only be deprived of access to these new services but they may be forced to pay higher prices for their remaining basic telephone service, particularly in non-metropolitan areas where smaller customer bases and lower economies of scale may result in dramatic price shifts. Accordingly, it is very important that LECs be allowed to obtain PCS licenses for use inside of their service territories. Such authority would be consistent with the Commission's general rule that market forces, rather than regulatory barriers, should determine how and when

¹¹ Written Testimony of Jim Chiddix of American Television & Communications Corporation before the Federal Communications Commission En Banc Hearing on Personal Communications Services, December 5, 1991, at p. 2.

technology is deployed and what services are offered to the public.¹²

Finally, to the extent that a LEC does not obtain a full PCS license through whatever assignment process is adopted, the ALLTEL Companies support the Commission's proposal to allow LECs to acquire some 2 Ghz spectrum for use within their service areas, but less than the amount proposed for other licensees. This proposal would serve the public interest for several reasons. First, such a reserve could provide LECs with a limited competitive response to new PCS services and, thus, reduce the impact on any subscribers left behind by emerging PCS providers. Second, such an allocation would ensure that telephone subscribers in rural areas have access to the wireless services used by their urban counterparts since, in many rural communities, these services may only be delivered by an incumbent local telephone company. Furthermore, this allocation will permit LECs to meet their universal service and public interest obligations in the most efficient and cost effective manner possible. Finally, because the Notice proposes no market areas small enough to ensure a reasonable expectation of participation by most independent telephone companies, including the ALLTEL local exchange telephone companies, a smaller allocation

¹² Second Report and Order, Recommendation to Congress, and Second Further Notice of Proposed Rulemaking, CC Docket No. 87-266, Telephone Company-Cable Television Cross-Ownership Rules, (FCC 92-327) released August 14, 1992 at p. 55.

would permit these companies to offer PCS services in the event large market areas are adopted. In order for this smaller allocation to be effective, a fixed amount of spectrum should be assigned only for use by incumbent local exchange carriers, based on telephone service area boundaries, for delivery of any wireless services.

IV. PCS SERVICE AREAS

After eligibility, the issue of service areas is perhaps the most critical to achieving the goals set forth by the Commission. The reason for this is clear. Although the issue of eligibility determines who the permissible players will be, it is the issue of service areas that determines who among those participants can afford to participate.

The ALLTEL Companies believe that use of the 734 MSA and RSA cellular service areas for PCS licensing will best ensure the development of the dynamic and competitive wireless marketplace envisioned by the Commission. The smaller size of these areas, the distinction between rural and non-rural markets, the flexibility to respond to the marketplace, and consistency with existing cellular areas all support the use of MSAs and RSAs for licensing.

Small license areas would enable more companies, including smaller communications companies, to participate in the PCS marketplace and, thus, would encourage competition and availability of diverse services. The capital costs of building out a regional

or national system would be prohibitive for many smaller companies who could otherwise be valuable and energetic PCS participants. These companies should not be shut out when good alternatives, such as MSA and RSA license areas, exist.

Small service areas will also ensure that smaller or rural territories are covered faster because licensees in those areas will concentrate their efforts in those particular areas rather than focus primarily on the major metropolitan areas included in the larger service area proposals, thereby promoting universality and speed of deployment. As Commissioner Quello explained when he suggested that MSAs and RSAs deserved comment in this proceeding, "Smaller service areas may facilitate delivery of PCS to rural areas in a timely manner."¹³

Perhaps most important, however, is the fact that service areas can be merged from small to large based upon the demands of the marketplace, but the opposite, dividing large areas into small, would be both unlikely and unworkable. The Notice appears to discount the use of MSAs and RSAs, explaining that the subsequent consolidation of these areas supports the use of larger territories.¹⁴ The Commission, therefore, appears to assume that it can better determine appropriate market configurations than the

¹³ See separate Statement of Commissioner James H. Quello. Re: Amendment of the Commission's Rules to Establish New Personal Communication Services, at p. 1.

¹⁴ Notice at para. 60.

market itself. This is simply not the case. Cellular market consolidations reflected the economics of the marketplace and were based upon the demands of consumers and competition and, thus, have contributed to the dynamic cellular marketplace that exists today. The PCS marketplace deserves the same chance to evolve responsively.

The Commission also seems wary of adopting MSA/RSA license areas because of a concern that the number of licenses assigned for cellular resulted in administrative overload.¹⁵ But it was not the license areas used or the number of licenses assigned that caused the imposition. It was the licensing mechanism itself (the relatively unrestricted lottery process). These problems can be solved by the imposition of stricter application procedures. Indeed, the Commission recently indicated that the benefit of MSA and RSA configurations outweighed administrative concerns when it adopted the use of MSA and RSA service areas for interactive video and data services licensing.¹⁶

It is also important to view the establishment of licensing areas from a competitive standpoint. As discussed earlier, whatever else it also may be, it is clear that PCS will be a full-

¹⁵ Id. at para. 57.

¹⁶ See Report and Order, Gen. Docket No. 91-2 (FCC 92-22), Amendment of Parts 0, 1, 2 and 95 of the Commission's Rules to Provide Interactive Video and Data Services, released February 13, 1992 at para. 62.

fledged competitor to cellular. For this reason, the Commission should seek to establish the most pro-competitive environment possible for both incumbents and new entrants. Adoption of distinct market areas, particularly larger ones, would be a significant competitive disadvantage for cellular carriers who alone would be faced with the costs of reconfiguring their markets to align with the new territories or be left to compete against a provider whose larger license area automatically provides him a "leg up".

For all these reasons, the ALLTEL Companies urge the Commission to adopt the MSA and RSA service areas presently used by cellular and IVDS. Additionally, the ALLTEL Companies strongly oppose the assignment of national licenses. While the desire to achieve technical uniformity is commendable, national licenses are neither necessary nor useful. National licenses will only limit the number of eligible players, inhibit small business entrants, delay service delivery to rural areas and leave other providers at a severe competitive disadvantage.

V. NUMBER OF LICENSEES

The Notice states "It is our goal to provide an allocation that allows for the provision of the widest range of PCS services at the lowest cost to consumers."¹⁷ The ALLTEL Companies support

¹⁷ Notice at para. 34.

this goal and urge the Commission to permit licensing of five 2 Ghz licensees of 20 Mhz each with 5 Mhz held in reserve for each licensee. Five licenses should be awarded to qualified entrants, including LECs and cellular carriers. This will promote competition and the realization of the full potential of PCS envisioned by the Commission. The assignment of a 20 Mhz license with 5 Mhz held in reserve will permit PCS to be fully competitive with cellular or other wireless services, but will avoid "over-allocating" for an array of services that are still emerging.

VI. REGULATORY STATUS

The Notice seeks comment on whether PCS should be classified as a common carrier or private land mobile radio service.¹⁸ The ALLTEL Companies strongly believe that PCS should be regulated on a common carrier basis. Because regulatory burdens are costly in terms of money, personnel and competitive responsiveness, regulation (or the absence of it) can directly contribute to the success of one competitor over another. In this regard, the regulatory status assigned to PCS is very important.

The Commission should not artificially separate two classes of carriers that fully intend to compete with each other, vesting one with a regulatory system that permits state preemption and imposes no universal service or minimum coverage requirements, while the

¹⁸ Id. at para. 95.

other struggles with state regulatory impositions, minimum coverage and universal service obligations and a host of other common carrier duties. In a PCS environment, new wireless service providers will openly compete with LEC and cellular services provided pursuant to common carrier rules. In order to ensure competitive parity, PCS should be classified as a common carrier service and the rules governing PCS should apply equally to all wireless service providers, including cellular and LECs offering spectrum-based services. The PCS marketplace deserves a full field of participants each of which is able to be equally responsive to the demands of consumers and the marketplace. Equivalent regulatory treatment among PCS providers will promote such an environment.

VII. CONCLUSION

The ALLTEL companies urge the Commission to adopt the recommendations discussed herein. These proposals will allow entry by interested parties on a competitive basis, promote universal service, facilitate participation by small business entrants and address the unique needs of rural areas and, thus, further the

Commission's goals of universality, speed of deployment, diversity
of services, and competitive delivery.

Respectfully submitted,

The ALLTEL Companies

By



Diane Smith
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Their Attorneys

November 9, 1992

Certificate of Service

I, Rita Ferrando, do hereby certify that on this 9th day of November 1992 copies of the foregoing comments were served by hand or by U. S. Mail, postage prepaid, to those on the attached service list.


Rita Ferrando

November 9, 1992

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